

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDERSON SAM BONILLA ECHEGOYEN,
aka "Anderson Samuel
Bonilla,"
aka "Anderson Sam Echegoyen,"
aka "Anderson Sam
Bonilla-Echegoyen,"

Defendant.

CR No. 18-

CR 18-00876-
SJ

I N D I C T M E N T

[18 U.S.C. § 1014: False Statement
to a Financial Institution;
18 U.S.C. § 1029(a)(2): Use of an
Unauthorized Access Device;
18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1014]

On or about June 26, 2018, in Los Angeles County, within the
Central District of California, and elsewhere, defendant ANDERSON SAM
BONILLA ECHEGOYEN, also known as ("aka") "Anderson Samuel Bonilla,"
aka "Anderson Sam Echegoyen," aka "Anderson Sam Bonilla-Echegoyen"
("BONILLA ECHEGOYEN"), knowingly made false statements and reports to
Synchrony Bank ("Synchrony"), an institution the accounts of which

1 were insured by the Federal Deposit Insurance Corporation, for the
2 purpose of influencing the actions of Synchrony, in connection with
3 an application to obtain a line of credit from CareCredit, which was
4 administered by Synchrony. Specifically, in an online application
5 for a line of credit from CareCredit to pay for dental work,
6 defendant BONILLA ECHEGOYEN falsely represented that his name was
7 "C.M.," that his date of birth was XX-XX-1977, and that his social
8 security number was XXX-XX-9544 when, in truth and in fact, as
9 defendant BONILLA ECHEGOYEN then well knew, his name was not "C.M.,"
10 his date of birth was not XX-XX-1977, and his social security number
11 was not XXX-XX-9544.

COUNT TWO

[18 U.S.C. § 1029(a)(2)]

On or about June 26, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant ANDERSON SAM BONILLA ECHEGOYEN, also known as ("aka") "Anderson Samuel Bonilla," aka "Anderson Sam Echevoyen," aka "Anderson Sam Bonilla-Echevoyen," knowingly and with intent to defraud, used an unauthorized access device, as defined in Title 18, United States Code, Sections 1029(e)(1) and (3), namely, a social security number belonging to C.M., and by such conduct obtained things of value aggregating at least \$1,000 during a one-year period, with said use affecting interstate and foreign commerce.

COUNT THREE

[18 U.S.C. § 1028A(a)(1)]


On or about June 26, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant ANDERSON SAM BONILLA ECHEGOYEN, also known as ("aka") "Anderson Samuel Bonilla," aka "Anderson Sam Echegoyen," aka "Anderson Sam Bonilla-Echegoyen" ("BONILLA ECHEGOYEN"), knowingly possessed and used, without lawful authority, means of identification that defendant BONILLA ECHEGOYEN knew belonged to another person, namely, the name, date of birth, and social security number of C.M., during and in relation to the offense of Use of an Unauthorized Access Device, a felony violation of Title 18, United States Code, Section 1029(a)(2), as charged in Count Two of this Indictment.

A TRUE BILL

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Foreperson

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